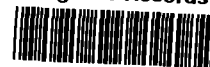




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

000003

EPA Region 5 Records Ctr.



230196

1 SEP 19 1995

REPLY TO THE ATTENTION OF

MEMORANDUM

HSE-5J

DATE:

SUBJECT: ACTION MEMORANDUM request for an Time-Critical Removal Action at the Harvey GRQ Asbestos Site, Harvey/Dixmoor, Cook County, Illinois (Site ID# 0V)

FROM: Cindy Nolan, On-Scene Coordinator
Emergency Response Section II

THRU: Richard Karl, Chief *P. Karl*
Emergency and Enforcement Response Branch

TO: William E. Muno
Associate Director for Superfund

I. PURPOSE

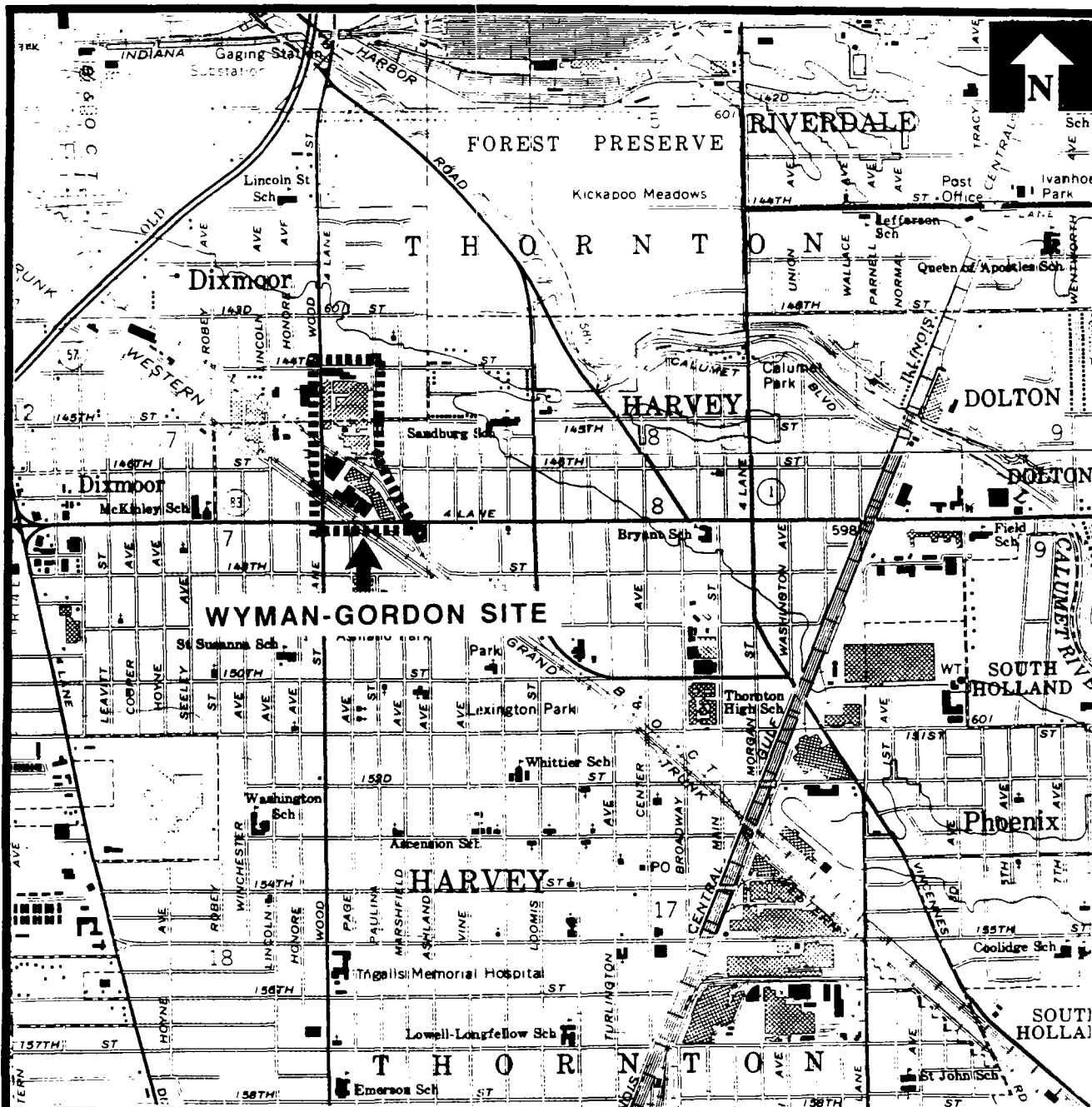
The purpose of this action memorandum is to obtain your approval to expend up to \$1,755,000.00 to conduct a time-critical removal action as described herein at the Harvey GRQ Asbestos Site in Harvey/Dixmoor, Cook County, Illinois. The site is an abandoned industrial complex consisting of approximately 40 buildings with unrestricted access. This action is necessary to abate the immediate threat to public health and the environment posed by the presence of friable asbestos due to vandalism by scrap metal scavengers.

This site is not on the National Priorities List (NPL).

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID Number: ILD001128024

The Harvey GRQ (HGRQ) Site has its address listed as 14600 S. Wood in Harvey, Cook County, Illinois, however it is situated in a mixed residential and industrial area, and lies partially in the City of Harvey and the Village of Dixmoor (figure 1). The HGRQ Site is a former industrial complex approximately 35 acres in size, consisting of approximately 40 large buildings. HGRQ is bordered on the north by 144th Street; with residences immediately to the north, Wood Street to the west; with



Quadrangle Location ■

ILLINOIS



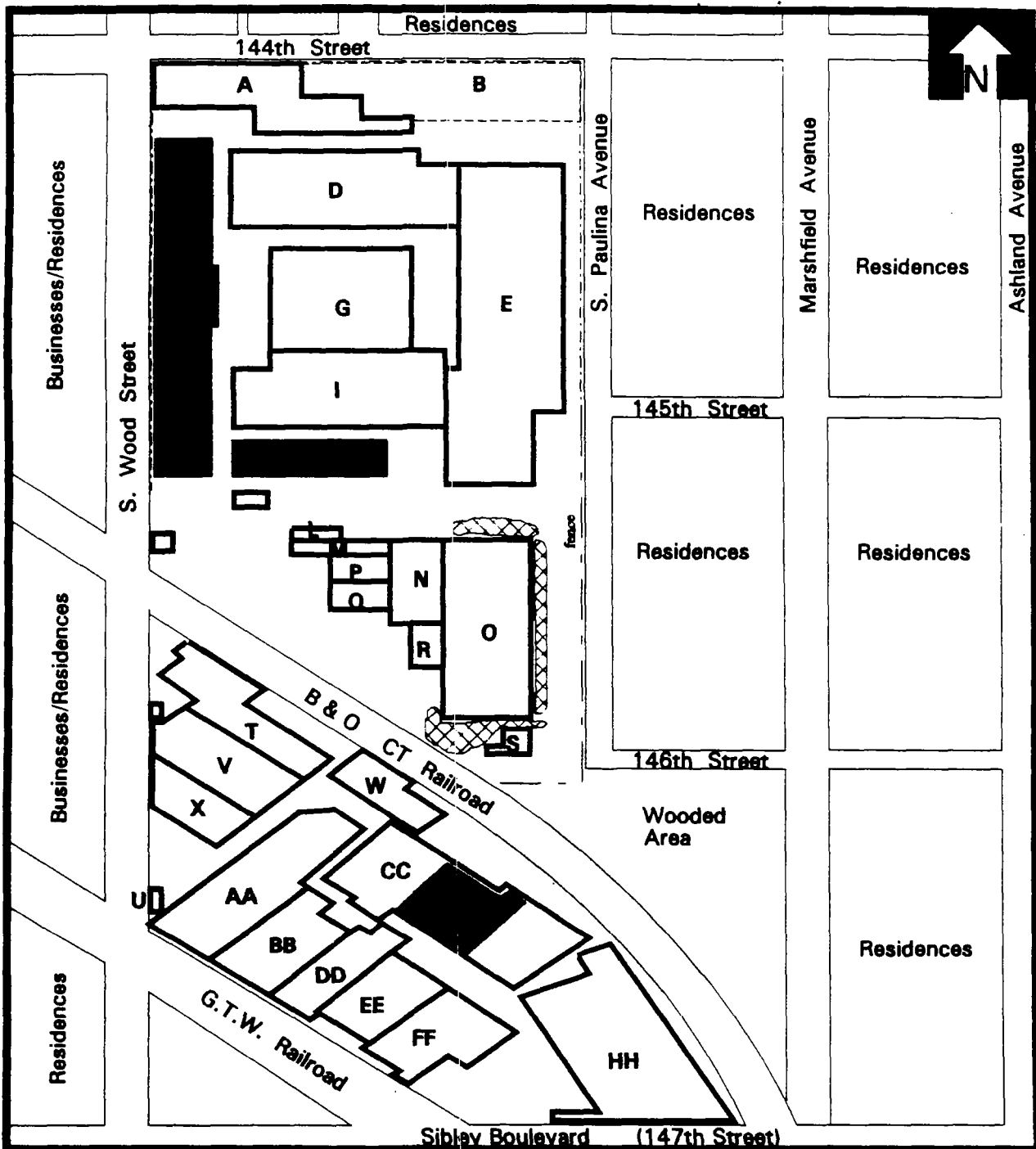
U.S. Environmental Protection Agency
Emergency and Enforcement Response Branch

TITLE	SITE LOCATION MAP		FIGURE #	1
SITE	WYMAN-GORDON SITE		SCALE	1:24,000
CITY	HARVEY	STATE	ILLINOIS	PAN
SOURCE	USGS TOPOGRAPHICAL MAP, HARVEY & BLUE IS., IL, QUADRANGLES, 7.5' SERIES			DATE
				1973
			REVISED	6/26/95

industrial and commercial properties across the street; 147th Street to the south, with residential and commercial properties across the street; Grand Trunk Western Railroad to the southwest and Paulina Avenue and a wooded area to the east. The area can be considered economically depressed with the majority of residents being minorities. Both the City of Harvey and the Village of Dixmoor are economically strapped as well. The B & O C.T. Railroad transects the facility from south of 145th Street on the west side to approximately 146th Street on the east (figure 2).

The buildings are constructed of steel beams and several thousand linear feet of piping. The piping, both inside and outside of the facility was insulated with asbestos containing material (ACM) as well as several large boilers. As of recent times (within the past year), heavy vandalism has occurred at the Site and continues to occur. Vandals have been encountered (most recent was on the EPA Site Assessment) and continue to enter the site as there are numerous holes in the fencing throughout the site. Access can be gained at numerous locations throughout the site because access is unrestricted. Vandals have been dismantling pipes, leaving asbestos insulation on the ground outdoors and on the floor indoors. Outdoor ACM include large amounts of insulation which lie on the rooftops. Even the most elevated pipes have been tampered with as the vandals will use ladders or whatever means necessary to get to the piping. Copper wire is also being removed from the buildings. All the materials are then sold to scrap metal dealers. Building S contains two horizontal oil tanks with an estimated capacity of 10,000 gallons each. Both are thought to be empty. The building also contains a pit in the floor which contains an unknown quantity of oil. Building X contains one 10,000 gallon tank that is estimated to be 3/4 full. Most of the buildings are unlocked and a majority of the numerous windows throughout the facility are broken. Due to the extremely large size of the site, it is impossible to adequately secure the site even as an interim measure. Building CC (see fig. 2) is partially collapsed, possibly due to the constant dismantling of the building both inside and outside by vandals.

The Wyman-Gordon Company operated a stamping plant and other operations at the HGRQ facility until approximately 1976. Under ownership by Leonard Kirtman and Harvey GRQ, Inc. the company moved from the Harvey location to a smaller facility in southern Illinois in 1988. In July 1994, the State of Illinois issued a consent order to Harvey GRQ, Inc. and Leonard Kirtman, to address asbestos issues and the oil spill in building S at the facility. None of the items in the order have been addressed. Buildings A, C, F, H, and J have been cleaned up and are currently being leased and used for commercial businesses. An automobile bumper refinishing business, Quality Bumper, currently operates at the facility and these employees were seen outdoors eating lunch a few meters from a large pile of asbestos.



LEGEND

- A Large building identification.
- Occupied by a business.
- Partially-collapsed portion of building.
- Large asbestos piles.
- Small buildings.



U.S. Environmental Protection Agency
Emergency and Enforcement Response Branch

TITLE SITE FEATURES MAP		FIGURE # 2
SITE WYMAN-GORDON SITE		SCALE 1:24,000
CITY HARVEY	STATE ILLINOIS	PAN EIL0890SAA
SOURCE ECOLOGY & ENVIRONMENT, INC.		DATE 6/27/95

The initial site assessment was conducted on June 2, 1995 by OSC Cindy Nolan, TAT personnel, Illinois EPA asbestos inspector Fred Lebensorger, Village of Dixmoor Fire Chief and the City of Harvey Fire Department Captain. A driving tour was taken around the perimeter of the site and all gates encountered were opened and unlocked. The group toured most of the buildings while donning Level C personal protection. The two Fire Department representatives donned Level B. Photographs and samples had been taken at various locations throughout the site. All the samples contained $\geq 25\%$ asbestos minerals. Samples contained 30-80% chrysotile and 20-30% crocidolite. Crocidolite is an extremely hazardous asbestos mineral and the most dangerous.

On June 8, 1995 TAT conducted an inspection to determine the quantity of friable asbestos both inside and outside of the buildings on site. Each building was entered and the total quantity of friable asbestos, which includes loose asbestos (in cubic yards) and asbestos on pipes (in linear feet) was estimated. The volume of friable asbestos is estimated at 6,303 cubic yards indoors and 1,458 outdoors. Total friable asbestos is estimated at 7,761 cubic yards. The largest volume of loose ACM on floors and ground surfaces were observed in and around buildings D, G, E, I, O, W, X, AA, CC, EE, and FF.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT

The conditions at the Harvey GRQ Asbestos site meet the criteria for a removal action as stated in the National Contingency Plan (NCP), Section 300.415 (b) (2), specifically:

- a) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;

Friable asbestos containing materials (ACM) has been dumped onto numerous areas, both indoors and outdoors of the site. There is no site security and due to the large number of buildings contained within the site it would be impossible to secure. Three wild dogs were seen leaving one of the buildings on the day of the initial site assessment, which can be a route for migration of the asbestos. The friable asbestos is continuously being exposed to the ambient air and the potential exists for the asbestos to become airborne. Airborne friable asbestos is an inhalation hazard and is known to cause fibrotic scarring of lung tissue, potentially leading to asbestosis, mesothelioma, or lung cancer. Asbestos is regulated under the Toxic Substances Control Act (TSCA) and under the Clean Air Act (CAA). The immediate surrounding area north and east of the site is mainly residential along with some businesses. The potential to be exposed to any airborne ACM exists due to the proximity of the residents to the site and to the employees of Quality Bumper.

- b. The availability of other appropriate Federal or State mechanisms to respond to the release;

The Illinois Environmental Protection Agency requested the assistance of the U.S. EPA in May 1995. The response actions required to mitigate the threat at the site are currently beyond the resources of the Illinois EPA, the City of Harvey, and the Village of Dixmoor.

- c. weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;

The outdoor asbestos on the ground located throughout the facility is being exposed to rain and winds during dry weather conditions which may cause the asbestos to migrate into the residential areas. Several of the rooftops have a significant amount of asbestos which adds to potential exposure. Clouds of asbestos were potentially released as one building has already collapsed due to vandals ripping out piping and the internal supports of the building. Most of the buildings are not locked or secured and the majority of the windows have been broken, which could increase chances of exposure during windy conditions. This factor is present at the facility and the continued vandalism will assist in the deterioration of the buildings and possibly additional collapse and asbestos exposure.

IV. ENDANGERMENT DETERMINATION

Given conditions at the HGRQ site, the nature of the hazardous substances at the site, the extremely large amount of ACM at the site, and the potential exposure pathways to nearby populations as described in Sections II and III above, actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

Asbestos is regulated as a hazardous substance and is listed as such in the Clean Air Act (CAA) and the Toxic Substances Control Act (TSCA).

V. PROPOSED ACTIONS AND ESTIMATED COSTS

The following response actions are proposed to mitigate the threats posed by the approximately 7,800 cubic yards of unsecured asbestos containing materials (ACM) at the Harvey GRQ Asbestos Site:

1. Develop and implement a site Health and Safety Plan.
2. All loose (friable) asbestos both inside and outside of buildings will be located and placed in lined 30 cubic yard roll-off boxes.

3. Use vacuum loaders to remove loose dry asbestos from floors and other surfaces.
4. Remove friable asbestos from all piping using glove bags.
5. Air monitoring during abatement activities and perimeter air sampling will be conducted by an industrial hygienist.
6. Sample, transport and dispose of the ACM material at an EPA-approved landfill which is licensed to accept asbestos.

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants or contaminants at the site which may pose an imminent and substantial endangerment to public health and safety and to the environment.

All Federal and State Applicable or Relevant and Appropriate Requirements (ARARs) will be complied with to the extent practicable. A letter was sent to Mr. Fred Lebensorger of the Bureau of Air, Illinois EPA, requesting State ARARs.

Post-removal site control, consistent with the provisions of Section 300.415(k), will not be required upon completion of this proposed project due to mitigation of the current threats. Only the friable asbestos which pose an immediate public health threat will be addressed and disposed of during this proposed removal action. Additional undisturbed asbestos which does not currently pose an immediate health threat will remain at the site after completion of this removal action.

The estimated costs to complete the above cleanup activities are summarized below. These activities should require approximately 80 on-site working days to complete. Detailed cleanup contractor costs are presented in Attachment 1.

REMOVAL PROJECT CEILING ESTIMATE

EXTRAMURAL COSTS:

Cleanup Contractor Costs	\$1,080,304
Contingency (15%)	162,045
Subtotal	1,242,349
TAT (including multiplier costs)	139,658
Extramural subtotal	1,382,007
Extramural Contingency (20%)	207,301
TOTAL EXTRAMURAL COSTS	1,589,308

INTRAMURAL COSTS:

U.S. EPA Direct Costs (\$30 x 1920 Regional hours + 192 HQ hours)	63,360
U.S. EPA Indirect Costs (\$53 x 1920 Regional hours)	101,760
TOTAL INTRAMURAL COSTS	165,120
TOTAL REMOVAL PROJECT CEILING	1,754,428*

* Number rounded to the nearest thousand

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed or no action will increase the potential for airborne migration of asbestos which is a threat to public health and the environment of the nearby population. Due to unrestricted site access and the history of trespassing on the site, continued vandalism and scrapping will continue to occur causing the potential for additional releases of asbestos to the neighboring community. The potential health risk will remain for the employees of Quality Bumper if the situation is not addressed.

VII. OUTSTANDING POLICY ISSUES

Due to the precedent-setting nature of this removal action, concurrence for funding is required by Headquarters. A request for Concurrence on Proposed Nationally Significant Removal Action will be sent to HQ for approval.

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this site is contained in an Enforcement Confidential addendum (Attachment 2).

IX. RECOMMENDATION

This decision document represents the selected removal action for the Harvey GRQ Asbestos site in Harvey/Dixmoor, Illinois, developed in accordance with CERCLA as amended, as is consistent with the National Contingency Plan (NCP).

This decision is based on the Administrative Record for the site, the index of which is Attachment 3. Conditions at the site meet the NCP Section 300.415 (b) (2) criteria for a removal and I recommend your approval of the proposed removal action. The total project ceiling, if approved, will be \$1,755,000.00, of which \$1,449,650.00 can be used for cleanup contractor costs. You may indicate your decision by signing below.

APPROVE: Richard Karl for WEM DATE: 9-19-95
Associate Director for Superfund

DISAPPROVE: _____ DATE: _____
Associate Director for Superfund

Attachments:

1. Detailed Cleanup Contractor Estimate
2. Enforcement Addendum
3. Administrative Record Index

cc: T. Johnson, HQ 5202G
Don Henne, Regional Environmental Officer
U.S. Department of the Interior, Room 217
200 Chestnut Street, Philadelphia, PA 19106
Fred Lebensorger
Illinois EPA - Bureau of Air
1701 S. First Ave., Suite 600
Maywood, IL 60153
Bruce Everett, IEPA Springfield

bcc: S. Vega, HSE-5J
R. Karl, HSE-5J
W. Messenger, HSE-5J
D. Bruce, HSE-5J
L. Fabinski, HSRL-6J
O. Warnsley, HSM-5J
T. Lesser, P-19J
D. Crume, MF-10J
EERB Read File (M. Johnson)
EERB Delivery Order File (M. Gustafson)
EERB Site File (SF Central File Room)
A. Lilly, HSE-5J

_____, Contracting Officer
C. Nolan, On-Scene Coordinator, HSE-5J
J. Kujawa, Attorney, ORC, CS-29
W. Ryczek, Enforcement Specialist, HSE-5J

ATTACHMENT 1

DETAILED CLEANUP CONTRACTOR COST ESTIMATE

Redacted - not relevant to the selection of the removal action.

ENFORCEMENT ADDENDUM

Redacted - not relevant to the selection of the removal action.

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

ADMINISTRATIVE RECORD
FOR
HARVEY GRQ ASBESTOS SITE
HARVEY/DIXMOOR, ILLINOIS

August 21, 1995

<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
03/29/93	Beener, D., IEPA	Levine, S.	Memorandum re: Site Inspection Report	3
06/20/95	Landis, E., EEI	Sass, W., EEI	Memorandum re: Data Quality Assurance Review of Site Samples	3
00/00/00	Nolan, C., U.S. EPA	Muno, W. U.S. EPA	Action Memorandum (Pending)	